

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of Part 15 of the Commission's Rules)	ET Docket 98-153
Regarding Ultra-Wideband Transmission)	
Systems)	

**SPRINT MOTION TO EXCEED PAGE LIMITATION
FOR ITS PETITION FOR RECONSIDERATION**

Sprint Corporation, on behalf of its wireless division, Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint") respectfully requests a waiver of FCC Rule 1.429(d), which requires that petitions for reconsideration be limited to 25 pages, so that it can submit a petition that is no longer than 45 pages in length. In support thereof, Sprint states:

1. FCC Rule 1.429(d) provides that a petition for reconsideration "shall not exceed 25 double-spaced typewritten pages."¹ However, FCC Rule 1.3 authorizes the Commission to waive this rule "for good cause shown."²

2. The Commission's First Report and Order in this proceeding is lengthy and involves complex technical matters.³ Moreover, UWB is a new technology with the potential to have significant impacts on many spectrum licensees and their customers. Sprint intends to challenge a number of portions of the Order, and given the complexity of the issues, it is not feasible to address them in only 25 pages. The Commission has consistently granted extensions of the 25-

¹ 47 C.F.R. § 1.429(d).

² *Id.* at § 1.3.

³ See *Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, ET Docket No. 98-153, *First Report and Order*, FCC 02-48 (April 22, 2002).

page limit rule in circumstances such as this, where the proceeding involves “many new and complex issues.”⁴

3. Sprint further requests a waiver of FCC Rule 1.48(b), which ordinarily requires that requests for enlarged pleadings be filed “10 days before the filing date.”⁵ Sprint could not identify the issues it needs to raise on reconsideration until its technical staff had an opportunity to analyze the Order. This technical analysis took some time, especially given the length and complexity of the Order. Sprint notes that in other proceedings the Commission has granted motions to exceed the page limit rules even though the motion was filed after the reconsideration petition.⁶

4. No party would be prejudiced by grant of this waiver request. To the contrary, in a fact-heavy proceeding such as this, permitting Sprint to address the issues more fully will eliminate the risk of confusion and enable other parties to respond more precisely to the points Sprint raises. In the end, the beneficiaries of a more refined discussion of complex technical issues will be the Commission and ultimately, the public interest. Moreover, the *ex parte* process further ensures that parties will have full opportunity to address issues raised in this proceeding.

⁴ *Federal, State and Local Public Safety Agency Communications Requirements*, 15 FCC Rcd 16844, 16884 ¶ 89 (2000). See also *Advanced Television Systems*, 12 FCC Rcd 7698 ¶ 3 (1997); *2 GHz Mobile Satellite Services*, 12 FCC Rcd 6532, 6533 ¶ 3 (1997); *Local Competition Proceeding*, 11 FCC Rcd 11882 ¶ 2 (1996); *Dominant Carrier Regulations*, 5 FCC Rcd 7139 ¶ 3 (1990); *CPE/Enhanced Services Proceeding*, CC Docket No. 85-26, at ¶ 4 (Nov. 4, 1985); *Deregulation of Radio*, 87 F.C.C.2d 797, 799 n.2 (1981).


⁵ 47 C.F.R. ¶ 1.28(b).

⁶ See, e.g., *Federal, State and Local Public Safety Agency Communications Requirements*, 15 FCC Rcd 16844, 16884 ¶ 89 (2000).

Wherefore, for the foregoing reasons, Sprint Corporation respectfully requests that the Commission extend to 45 pages the page limit for Sprint's reconsideration petition of the Commission's First Report and Order in this proceeding.

Respectfully submitted,

SPRINT CORPORATION

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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